Three Bryant Park 1095 Avenue of the Americas New York, NY 10036-6797 +1 212 698 3500 Main +1 212 698 3599 Fax www.dechert.com

MICHAEL J. GILBERT

michael.gilbert@dechert.com +1 212 698 3886 Direct +1 212 698 0426 Fax

USDC SDNY

August 17, 2020

VIA ECF

The Honorable Kimba M. Wood United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

United States v. Janier Castillo, S17 13-cr-147 (KMW)

Dear Judge Wood:

MEMO ENDOR

On behalf of Janier Castillo, the defendant in the above-captioned case, we respectfully request that the Court permit Ms. Castillo to travel to visit her family in the Dominican Republic from August 22, 2020 to September 16, 2020.

Ms. Castillo pled guilty to Count Two of the Superseding Indictment on July 8, 2016, and was sentenced to a term of 24 months imprisonment on January 26, 2017. Ms. Castillo served her time at Alderson Federal Prison Camp in West Virginia, from on or about April 3, 2017 to on or about November 28, 2018. She is currently on supervised release for a term of two years, scheduled to expire on November 28, 2020. With the Court's permission, Ms. Castillo most recently traveled to the Dominican Republic this past December-January to visit family there for the first time in over five years. (See ECF 685 (September 18, 2019 approval granting Ms. Castillo's request for travel authorization)).

Ms. Castillo now wishes to return to the Dominican Republic to provide her family with support due to the COVID-19 pandemic, which has severely impacted the lives of Dominicans, including close members of her family. On August 12, 2020, Ms. Castillo learned that her uncle passed away from the virus. Her grandmother, who turned 100 this January, also contracted COVID-19 and is still recovering. Ms. Castillo's sister, who until recently had been receiving cancer treatment, has also seen her health deteriorate over the past few months. During her visit, Ms. Castillo will be staying with her parents.

We have discussed this request with the Probation Officer to whom she reports, Helwa Qasem, who has no objection to Ms. Castillo's travel. We also were in contact with the Assistant U.S. Attorneys who indicated that if Probation approves, the government does not object.

Thank you for your consideration in this matter.

SO ORDERED, N.Y., N.Y.

KIMDA

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Respectfully Submitted,

/s/ Michael J. Gilbert

Michael J. Gilbert

cc: All Counsel of Record (via ECF)cc: Ms. Helwa Qasem (via email)cc: Ms. Sally Diaz (via email)